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Representing New York State's
Not-For-Profit Hospitals, Health Systems,
and Continuing Care Providers



November 2, 2000

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Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20554

RE: Ultra-Wideband (ET Docket 98-153)

Dear Ms. Salas:

The Healthcare Association of New York State (HANYS) represents over 550 not-for-profit and public hospitals, nursing homes, home health agencies, hospices, and other similar providers throughout New York State. We are writing on behalf of our members regarding the Federal Communications Commission's (FCC's) Notice of Proposed Rulemaking concerning Ultra-Wideband (UWB) radio transmission.

HANYS is integrally involved in the development of Telehealth and Telemedicine related technology applications to establish new ways of increasing access to medical services in rural, remote and/or medically underserved areas of New York State. As we examine various applications to an Internet/Intranet environment, we are aware there exists tremendous potential for high-bandwidth wireless technology. The UWB technology offers the growing Telehealth and Telemedicine field the capability of transferring very large data files between health care providers across short distances.

Rural, sole-community hospitals, and other health care providers in many areas of New York have few sources of support for bringing technology into their facilities. Many rural and medically underserved areas of our state are eligible for support for telecommunications services under the federal universal services program (USP). However, the USP does not cover internal connections at all, and as medical information, clinical, and administrative functions move online it is imperative that our members be able to take advantage of low cost networking UWB technology. In addition, older buildings and traditional wired networking have proven extremely expensive and prohibitive for rural providers. The UWB technology enables rural health care providers and other institutions an opportunity to avoid costly and disruptive interior wiring projects and provide an inexpensive, low cost and high-speed wireless connectivity for local area networks (LANs). Also, such technology affords clinicians the opportunity to use a variety of monitors, personal digital assistants (PDAs), laptops, and other devices in a highly mobile environment.

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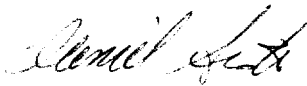
HANYS' members are increasingly looking for ways to communicate electronic patient medical records, including high-resolution images among wireless LAN users within facilities and/or among their affiliates and networks. In rural and medically underserved areas of our state, UWB technology can serve to facilitate medical specialty consults, obtain expedited second opinions involving patient care, transmit critical data to and from emergency service departments, and provide decision-making support by specialists at the point of patient care where it is especially vital. For example, bringing knowledge sources and medical databases via Internet connectivity through wireless LANs to the patient's bedside, hospitals are in a better position to reduce medical errors, a national issue highlighted in the Institute of Medicine's recent report titled, "To Err is Human: Building a Better Health System."

HANYS encourages the FCC to support UWB technology and move forward judiciously in its rulemaking activities. This technology has tremendous potential to enhance our members' ability to develop "electronic-health" applications that can contribute to helping improve clinical performance, improved quality of care outcomes, administrative efficiency, and assist in the reduction of medical errors. In addition, secure wireless connectivity to LAN systems will assist hospitals and health care providers to ensure safe, reliable, and accurate transmission of patient care records and other sensitive data required by the administrative simplification provisions of the federal Health Insurance and Portability and Accountability Act of 1996 (HIPAA). As you are aware, all of these areas are high priorities of state and federal health agencies.

HANYS is excited about the prospects for UWB. We look forward to working further with the FCC to help develop and implement useful clinical and administrative applications for our health care institutions and the thousands of patients our members serve. We hope the FCC will favorably view the possibilities of UWB for health care in its rule making activities. Thank you for consideration of our comments.

If you have any questions, you may contact James Bilby, Director of Regulatory Affairs and Rural Health at (518) 431-7721, or via email at jbilby@hanys.org. We look forward to working together on this important matter.

Sincerely,



Daniel Sisto
President

DS:cm